

EXHIBIT “A”

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June 23, 2014

Mr. Christopher Paul Hanslik
Mr. Edgar Saldivar
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Houston, Texas 77027
Attorneys for Defendants

Via Fax: 713.552.1758

Re: Cause No. 1:08-CV-446; *United States of America, ex rel. Michael N. Swetnam, Jr. v. Valley Baptist Health System and Valley Baptist Medical Center*; In the United States District Court for the Southern District of Texas, Brownsville Division.
WG File #395001

Dear Counsel:

Attached please find a spreadsheet that identifies several documents produced by Defendants in the above-referenced matter, which were incomplete. Please produce complete copies of all of these documents, including any and all exhibits attached thereto.

Should you have any questions or comments, please do not hesitate to call. Thank you for your attention to this matter.

Very truly yours,



Edward W. Allred

EWA:ccp
Attachment

| INCOMPLETE DOCUMENTS PRODUCED BY DEFENDANTS | | |
|---|--------------|--|
| VB-QT 000704 | VB-QT 000704 | Page 4 Only of 4/28/1988 VBMC Finance Committee Minutes re: New Insurance Requirements-Produced by Defendants on June 10, 2011 |
| VB-QT 000708 | VB-QT 000709 | Page 3 & 4 Only of 3/31/1988 VBMC Board of Trustees, Advisory Board, Liaison Committee re: Insurance |
| VB-QT 001026 | VB-QT 001028 | Produced by Defendants on June 10, 2011 |
| VB-QT 001029 | VB-QT 001031 | 9/26/1996 VBMC Board of Trustees, Advisory Board and Liaison Committee Meeting Minutes (Missing Pages) - Produced by Defendants on June 10, 2011 |
| VB-QT 001032 | VB-QT 001033 | 7/30/1998 VBMC Board of Trustees and Advisory Board Meeting Minutes (Missing Pages) - Produced by Defendants on June 10, 2011 |
| VB-QT 001034 | VB-QT 001036 | 9/30/1998 VBMC Board of Trustees and Advisory Board Meeting Minutes (Missing Pages) - Produced by Defendants on June 10, 2011 |
| VB-QT 001037 | VB-QT 001040 | 7/26/2001 VBMC Board of Trustees and Advisory Board Meeting Minutes (Missing Pages) - Produced by Defendants on June 10, 2011 |
| VB-QT 001075 | VB-QT 001075 | 3/28/2002 VBMC Board of Trustees Meeting Minutes (Missing Pages) - Produced by Defendants on June 10, 2011 |
| VB-QT 001076 | VB-QT 001077 | Page 2 Only of 7/10/2001 VBMC Insurance & Claims Management Meeting Minutes re: Minimum Insurance Requirements - Produced by Defendants on June 10, 2011 |
| VB-QT 001078 | VB-QT 001078 | Pages 9&10 Only of 7/26/2001 VBMC Meeting Minutes re: Minimum Insurance Requirements - Produced by Defendants on June 10, 2011 |
| VB-QT 001079 | VB-QT 001079 | Page 2 Only of 7/19/2002 Liaison Committee Meeting Minutes re: Minimum Insurance Requirements - Produced by Defendants on June 10, 2011 |
| VB-QT 001080 | VB-QT 001080 | Page 6 Only of 7/28/2002 VBHS Meeting Minutes re: Minimum Insurance Requirements - Produced by Defendants on June 10, 2011 |
| VB-QT 001081 | VB-QT 001081 | Page 4 Only of 1/21/2003 VBHS Finance Meeting Minutes re: Minimum Insurance Requirements - Produced by Defendants on June 10, 2011 |
| VB-QT 001082 | VB-QT 001082 | Page 2 Only of 8/17/2004 VBHS Finance Meeting Minutes re: Minimum Insurance Requirements - Produced by Defendants on June 10, 2011 |
| VB-QT 001278 | VB-QT 001286 | Page 4 Only of 8/26/2004 VBHS Meeting Minutes re: Minimum Insurance Requirements - Produced by Defendants on June 10, 2011 |
| | | VHA/Medical Protective Professional Liability Program - Physician Insurance Program (Missing Pages) - Produced by Defendants on June 10, 2011 |

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| VB-QT 001312 | VB-QT 001314 | Pages 2-4 Only of 6/25/1999 VBMC Insurance & Claims Management Meeting Minutes |
| VB-QT 001461 | VB-QT 001462 | MISSING PAGES - Produced by Defendants on June 10, 2011 |
| VB-QT 002069 | VB-QT 002127 | Pages 5 & 6 Only of Provider Summary Report (Provider 452352) - Produced by Defendants on June 10, 2011 |
| VB-QT 002140 | VB-QT 002140 | Asset Purchase Agreement - (Missing Pages - Jumps from 18 to 24) - Produced by Defendants on June 10, 2011 |
| VB-QT 002152 | VB-QT 002152 | Page 3 Only of 4/28/1988 VBMC Board of Trustees, Liaison Committee Meeting Minutes re: Minimum Insurance Requirements - Supplemental Disclosure Produced by Defendants on June 29, 2011 |
| VB-QT 002162 | VB-QT 002163 | Page 4 Only of 4/28/1988 VBMC Finance Committee Meeting Minutes re: Minimum Insurance Requirements - Supplemental Disclosure Produced by Defendants on June 29, 2011 |
| VB-QT 002175 | VB-QT 002176 | Pages 3 & 4 Only of 3/31/1988 VBMC Board of Trustees Meeting Minutes re: Minimum Insurance Requirements - Supplemental Disclosure Produced by Defendants on June 29, 2011 |
| VB-QT 002177 | VB-QT 002186 | Pages 2 & 3 Only of 5/9/1988 Letter to Ben McKibbens from James R. Posner - Supplemental Disclosure Produced by Defendants on June 29, 2011 |
| VB-QT 002226 | VB-QT 002229 | 6/9/1993 Letter to Southern Baptist Annuity Board from Marsh & McLennan re: Minimum Insurance Requirements (Missing Pages) - Supplemental Disclosure Produced by Defendants on June 29, 2011 |
| VB-QT 002230 | VB-QT 002232 | Pages 1, 2, 10 & 11 Only of 7/29/1999 VBMC Internal Audit Report Second Quarter, 1999 Cost Reporting - Supplemental Disclosure Produced by Defendants on June 29, 2011 |
| VB-QT 002233 | VB-QT 002235 | Pages 1, 6 & 7 Only of 9/26/1996 VBMC Board of Trustees Meeting Minutes re: Minimum Insurance Requirements - Supplemental Disclosure Produced by Defendants on June 29, 2011 |
| VB-QT 002236 | VB-QT 002237 | Pages 1, 8 & 9 Only to 7/30/1998 VBMC Board of Trustees Meeting Minutes re: Minimum Insurance Requirements - Supplemental Disclosure Produced by Defendants on June 29, 2011 |
| | | Pages 1 & 10 Only to 9/30/1999 Confidential VBMC Board of Trustees Meeting Minutes re: Minimum Insurance Requirements - Supplemental Disclosure Produced by Defendants on June 29, 2011 |

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| VB-QT 002238 | VB-QT 002240 | Pages 1, 2, & 10 Only of 7/26/2001 Confidential VBMC Board of Trustees Meeting Minutes re: Minimum Insurance Requirements - Supplemental Disclosure Produced by Defendants on June 29, 2011 |
| VB-QT 002241 | VB-QT 002244 | Pages 1, 5, 6 & 7 Only of 3/28/2002 Confidential VBMC Board of Trustees Meeting Minutes re: Minimum Insurance Requirements - Supplemental Disclosure Produced by Defendants on June 29, 2011 |

TRANSACTION REPORT

JUN/23/2014/MON 03:22 PM

FAX (TX)

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DATE: JUNE 23 2014

TO: CHRISTOPHER HANSLIK
EDGAR SALDIVAR
MATTHEW S VEECH

FAX NUMBER: 713.552.1758

FROM: EDWARD W. ALLRED

RE: SWETNAM
WG FILE NO 395001

NUMBER OF PAGES (INCLUDING COVER PAGE): 5

COMMENTS:

If there are any problems, please call 210.527.0500 and ask for Colleen Peebles or by email at cpeebles@wattsguerra.com.